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Counsel for Defendant ALONSO LOPEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 08-00603 JF
	)	
Plaintiff,	)	<b>STIPULATION TO POSTPONE</b>
	)	<b>DEFENDANT'S SELF-SURRENDER</b>
v.	)	<b>DATE; [PROPOSED] ORDER</b>
	)	
ALONSO LOPEZ,	)	
	)	
Defendant.	)	
	)	

Defendant and the government, through their respective counsel, hereby stipulate that, subject to the court's approval, the defendant's self-surrender date may be continued from April 24, 2009 to May 22, 2009.

The postponement is requested because Mr. Lopez is attempting to establish a Forbearance Plan with respect to his home mortgage due to financial hardship. His goal is to modify or reduce the mortgage loan payments to ensure that his family will be able to remain in the family home while he is incarcerated. In order to set up a Forbearance Plan, the mortgage lender, Chase Home Finance, proposed terms including payment of a "down payment" and three "arrearage payments." At this time, defense counsel is informed that two of the arrearage payments remain due, and total \$1,600. The delay in Mr. Lopez's self-surrender is requested so

1 that he can continue to work to earn money to pay the remaining \$1,600 requested by the lender  
2 before he is incarcerated.

3 A copy of the mortgage lender's letter to Mr. Lopez, outlining the above proposal, has  
4 been provided to government counsel.

5 For the foregoing reasons, the parties stipulate that Mr. Lopez's self-surrender date may  
6 be postponed to May 22, 2009.

7 Dated: 4/15/09

/s/  
\_\_\_\_\_  
LARA S. VINNARD  
Assistant Federal Public Defender

9 Dated: 4/15/09

/s/  
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TOM O'CONNELL  
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALONSO LOPEZ,

Defendant.

No. CR 08-00603 JF

**[PROPOSED] ORDER POSTPONING  
DEFENDANT'S SELF-SURRENDER  
DATE**

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the self-surrender date in  
this matter, presently April 24, 2009, be postponed to May 22, 2009.

Dated: 4/20/09

  
JEREMY FOGEL  
United States District Judge